

EXHIBIT 4

4. Since approximately 1982 my legal practice has been devoted almost completely to bankruptcy matters.
5. I served as a member of the panel of Chapter 7 bankruptcy trustees for the United States Bankruptcy Court for the Western District of North Carolina for over thirty five years.
6. I am a partner in the law firm of Sigmon & Henderson PLLC of Gastonia, North Carolina. Derick Henderson, my partner in said firm is one of the Class Counsel in the Cotton Case (as defined below). Thus I have a potential financial interest in the outcome of the Cotton Case. However, I submit that the opinions I state in this Affidavit are not affected by personal financial considerations and are entirely the same as they would be if I had no financial interest.
7. In my years of bankruptcy practice I have represented debtors, creditors, Chapter 7 trustees, and adversary proceeding plaintiffs and defendants. I have been involved in various capacities in thousands of bankruptcy cases.
8. In my years of bankruptcy practice I have been involved in and represented parties in numerous multiple party cases, some of which were filed as class actions and some of which were filed as separate adversary proceedings with common facts which were consolidated in various forms for pre-trial matters and for trial. I believe that I have the knowledge and experience necessary to render the opinions stated herein.
9. I have reviewed various pleadings and court orders in the above captioned adversary proceeding (the "Cotton Case").
10. My hourly rate for attorneys fees in bankruptcy matters in the Western District of North Carolina over the past few years has been \$500.00 per hour. This hourly rate has been approved by the Bankruptcy Court in hundreds of cases and is consistent with the hourly rates charged by other bankruptcy specialists in the Western District.
11. From my review of the pleadings in the Cotton Case and my experience in handling multiple party litigation in bankruptcy cases, it is my opinion that the attorney fees requested by class counsel are fair and reasonable. I form this opinion based upon the complexity of the issues involved, the significant successful result achieved by the proposed settlement, and the inherent risk involved in representing parties in class actions.
12. I have been involved in multiple party litigation where I expended extensive time and effort for which I received absolutely nothing in fees. The financial risk to the plaintiffs' counsel in taking on such cases is significant.

13. Contingent fees such as those requested by class counsel here are fair and reasonable and actually necessary to give plaintiffs' attorneys incentive to bring such actions which definitely benefit the consumer plaintiffs.

I declare under penalty under the laws of the United States of America the foregoing is true and correct.

Dated: 2-12-19



P. Wayne Sigmon